

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

HUTTO INDEPENDENT SCHOOL DISTRICT,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 1:13-CV-00055-LY
v.	)	
	)	
RONNIE MOORE, and CHRISTOPHER	)	
SCHULTZ, and CIRKIEL AND ASSOCIATES,	)	
P.C.	)	
Defendants.		

**DEFENDANTS CIRKIEL & ASSOCIATES, P.C. AND CHRISTOPHER SCHULTZ’S UNOPPOSED  
MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE PLEAD IN RESPONSE TO PLAINTIFF’S  
COMPLAINT**

TO THE HONORABLE LEE YEAKEL, UNITED STATES DISTRICT JUDGE:

COME NOW Defendants Christopher Schultz and Cirkiel and Associates, P.C. (“Defendants”) and hereby respectfully request an extension of time up to and including March 27, 2013, to answer or otherwise plead in response to Plaintiff’s Original Complaint in the above-captioned matter. In support thereof, Defendants would show as follows:

1. Defendants Christopher Schultz and Cirkiel and Associates, P.C. were served with this lawsuit on February 5, 2013, making their respective Answers to Plaintiff’s Original Complaint currently due on February 25, 2013. Defendants are seeking a thirty (30) day extension of time, from the current deadline date, to answer or otherwise plead in response to Plaintiff’s Original Complaint. If granted, Defendants’ new answer deadline would be March 27, 2013.

2. Undersigned counsel were retained on or about February 20, 2013, and have not had an opportunity to fully analyze, *inter alia*, the potential grounds for dismissal of this action under TRCP 12(b), if any.

3. No previous requests for extensions of time have been made.
4. This motion is not made for unnecessary purposes or to delay the proceedings in this matter.
5. Counsel for the parties have conferred and this motion as well as the relief requested herein are unopposed by Plaintiff.

WHEREFORE, PREMISES CONSIDERED, Defendants Christopher Schultz and Cirkiel and Associates, P.C. respectfully request the Court extend their deadline to answer or otherwise plead in response to Plaintiff's Original Complaint up to and including March 27, 2013. Defendants additionally pray for such further relief to which they may be entitled either at law or in equity.

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, L.L.P.

By: /s/ Michael B. Johnson \_\_\_\_\_  
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**ATTORNEYS FOR DEFENDANTS CHRISTOPHER  
SCHULTZ AND CIRKIEL & ASSOCIATES, P.C.**

**CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff Hutto ISD has been contacted concerning the merits of this motion, and Plaintiff is not opposed.

/s/ Michael B. Johnson

**CERTIFICATE OF SERVICE**

This is to certify that on February 22, 2013, a true and correct copy of the foregoing was served via electronic transmission through the court's ECF system upon the counsel of record below:

Heather R. Rutland  
Abraham F. Barker  
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/s/ Michael B. Johnson